

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

**In re: Sara Davis Harman
Debtor**

**CASE NO. 15-34112-KRH
CHAPTER 13**

**AS PONTOS LLC
Movant**

v.

**SARA DAVIS HARMAN and
CARL M. BATES
Respondents**

DEBTOR'S OBJECTION TO NOTICE OF DEFAULT

COMES NOW the Debtor, Sara Davis Harman ("Debtor"), by counsel, and objects to the Notice of Default filed by As Pontos, LLC ("Movant") as follows:

1. Debtor admits she was in default, but disputes the amount stated in Movant's Notice of Default.

2. Debtor asserts that she has cured the default.

WHEREFORE Sara Davis Harman, by counsel, requests that Movant withdraw the Notice of Default.

Respectfully Submitted,

Sara Davis Harman

By: /s/ Julia B. Adair
Julia B. Adair (VSB #45130)
Hathaway Adair, P.C.
710 N. Hamilton Street
Suite 200
Richmond, VA 23221
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2016, I served the foregoing Answer to Motion of Seterus, Inc. for Relief from Automatic Stay by electronic mail or first class mail, postage prepaid, to all necessary parties, including:

Andrew Todd Rich, Esquire
BWW Law Group, LLC
8100 Three Chopt Road, Suite 240
Richmond, VA 23229

Carl M. Bates, Trustee
P.O. Box 1819
Richmond, VA 23218

Sara Davis Harman
3216 Mountain Road
Glen Allen, VA 23060

/s/ Julia B. Adair
Counsel for Debtor